

# EXHIBIT 3

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**Attorneys for Plaintiff MARK SNOOKAL**

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,	)	CASE NO.: 2:23-cv-6302-HDV-AJR
	)	
	)	
Plaintiff,	)	<b>PLAINTIFF MARK SNOOKAL'S</b>
	)	<b>REQUEST FOR PRODUCTION OF</b>
	)	<b>DOCUMENTS TO DEFENDANT</b>
vs.	)	<b>CHEVRON USA INC., SET TWO</b>
	)	
	)	<b>[FRCP RULE 34]</b>
CHEVRON USA, INC., a California	)	
Corporation, and DOES 1 through	)	
10, inclusive,	)	
	)	
	)	
	)	
Defendants.	)	
	)	
	)	

**REQUEST FOR PRODUCTION NO. 29:**

For each person identified in YOUR response to Plaintiff's Interrogatory No. 1, produce all documents reflecting the "discussions" and/or "information" provided "in connection with the decision to declare Plaintiff Mark Snookal 'not fit'" for duty for the Reliability Engineering Manager position in Escravos, Nigeria.

**REQUEST FOR PRODUCTION NO. 30:**

For each person identified in YOUR response to Plaintiff's Interrogatory No. 1, produce their current Curriculum Vitae ("CV") and resume.

**REQUEST FOR PRODUCTION NO. 31:**

Produce all documents reflecting communications which refer or relate to Plaintiff Mark Snookal, made by any one of the persons identified in YOUR response to Plaintiff's Interrogatory No. 2.

**REQUEST FOR PRODUCTION NO. 32:**

Any and all documents reflecting Plaintiff Mark Snookal's job applications to any job with YOU from January 1, 2019 to the present.

**REQUEST FOR PRODUCTION NO. 33:**

Any and all documents reflecting Chevron's policies, procedures, and/or best practices for investigating complaints of discrimination in California from January 1, 2019 through January 1, 2022.

**REQUEST FOR PRODUCTION NO. 34:**

Any and all documents reflecting Chevron's policies, procedures, and/or best practices for providing disability accommodations in California from January 1, 2019 through January 1, 2022.

**REQUEST FOR PRODUCTION NO. 35:**

For each person identified in YOUR response to Plaintiff's Interrogatory No. 12, produce their current Curriculum Vitae ("CV") and resume.

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **July 12, 2024** I served the foregoing document described as **PLAINTIFF MARK SNOOKAL'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT CHEVRON USA, INC. SET TWO** on interested parties in this action:

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**[X] BY ELECTRONIC SERVICE:** Pursuant to the Parties' agreement to accept service electronically, I caused such document to be electronically served via email to the email addresses of the addressee(s).

Executed on **July 12, 2024** at Los Angeles, California.

**[X] Federal** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

  
ANGIE O. PAZ